

1 JEFFREY F. GERSH (Bar No. 87124)

jgersh@stubbsalderton.com

2 BLAINE A. O'MALLEY (Bar No. 319017)

bomalley@stubbsalderton.com

3 ALEXANDER P. MANGLINONG (Bar No. 327730)

amanglinong@stubbsalderton.com

4 **STUBBS ALDERTON & MARKILES, LLP**

5 15260 Ventura Boulevard, 20th Floor

Sherman Oaks, California 91403

6 Telephone: (818) 444-4500

7 Facsimile: (818) 444-4500

8 Attorneys for Plaintiff BroadSpring, Inc., a
Delaware corporation

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF ORANGE -- CENTRAL JUSTICE CENTER

11
12 BROADSPRING, INC., a Delaware
corporation,

13
14 Plaintiff,

15 v.

16 GURPREET LAKHIANI, aka GURPREET
BEDI, an individual; DEEPAK LAKHIANI,
17 an individual, HALONA ASSET
MANAGEMENT, LLC, a California limited
18 liability company; and DOES 1-50, inclusive,

19 Defendants.
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CASE NO.

VERIFIED COMPLAINT FOR:

1. BREACH OF FIDUCIARY DUTY;
2. AIDING AND ABETTING A BREACH OF FIDUCIARY DUTY;
3. FRAUDULENT MISREPRESENTATION;
4. CONSPIRACY TO COMMIT FRAUDULENT MISREPRESENTATION
5. FRAUDULENT CONCEALMENT;
6. CONSPIRACY TO COMMIT FRAUDULENT CONCEALMENT;
7. CONVERSION; AND
8. CONSPIRACY TO COMMIT CONVERSION

[JURY TRIAL DEMANDED]